



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

MEMO ENDORSED

August 28, 2020

BY ECF

The Honorable Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Fernandez-Rodriguez et al. v. Licon-Vitale*, No. 20 Civ. 3315 (ER)

Dear Judge Ramos:

This Office represents respondent Marti Licon-Vitale ("Respondent"), in her official capacity as Warden of the Metropolitan Correctional Center ("MCC"), with respect to the above-referenced petition for habeas corpus brought under 28 U.S.C. § 2241. We write respectfully to request a three-week extension of the previously set discovery deadlines to permit MCC to complete gathering information responsive to petitioners' requests. Petitioners do not object to this request. The extension is needed because of vacation and other scheduling issues that have affected MCC's ability to provide the relevant information and documents. Should this request be granted, the proposed new deadline for Respondent to provide written responses to interrogatories and document requests would be **September 21, 2020**, and Respondent's production of responsive documents would be substantially completed by **October 6, 2020**, except to the extent that search and production of emails is delayed as a result of discussions regarding search terms, or due to the volume or other complicating issues relating to responsive materials. The parties' joint letter regarding the need for further discovery would be due on **October 26, 2020**.

We thank the Court for its consideration of these matters.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney

By: s/Jean-David Barnea
JEAN-DAVID BARNEA
JESSICA JEAN HU
ALLISON ROVNER
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The application is X granted
_____ denied

Edgardo Ramos, U.S.D.J.
Dated: Aug. 30, 2020
New York, New York

cc: Counsel for Petitioners (By ECF & electronic mail)